

June 5, 2006
FCC Comments
98-120
Multicast – Must-carry

My name is Mike Taylor and I am the Vice President and Business Manager for Drewry Broadcasting representing licensee KSWO Television Co. Inc. and KSWO-TV/DT, Lawton, Oklahoma. This attachment concerns 98-120 and the multicast must-carry vote scheduled for June 15, 2006.

KSWO-TV/DT is currently broadcasting two additional digital broadcast channels. 11.2 is a Telemundo affiliation, providing Spanish language programming as well as local news and weather information to our viewing audience. It is our hope that as we expand our cable penetration, we will be able to provide at least one, perhaps more, thirty minute local newscasts per day, in Spanish. In addition, we have provided Spanish language broadcasts of Dallas Cowboys Preseason Football, as well as season-long special programs on the Cowboys. These Spanish language broadcasts are very popular with our Hispanic viewers.

11.3 is a local channel, providing weather, news, and special programming concerning the community we serve. For example, we air a program called “Working for You” featuring the Director of Economic Development of the Lawton, Oklahoma Chamber of Commerce. This program is designed to provide information on the local efforts to promote economic development in our viewing area. We also carry prime-time airings of local high school and college sports programs including Oklahoma University, The University of Texas, and Oklahoma State University. In addition KSWO-TV/DT is evaluating the purchase of additional weather equipment which will allow us to provide continuing weather information on this channel while airing the local programs our viewers are interested in at the same time. The long range plan for KSWO-TV/DT 11.3 is a strictly local channel, designed to serve the viewers of the Wichita Falls, Texas – Lawton, Oklahoma DMA, 24 hours a day with local information of importance to the viewers of our area.

KSWO-TV/DT has had limited success in our cable carriage efforts for both 11.2 and 11.3. Objections from cable operators are wide ranging and vary from operation to operation. Some of the smaller operations complain that they do not have the analog channel space and do not have a digital tier available to subscribers. The larger operations are reluctant to down-convert a digital signal to their analog tier and the number of digital subscribers is much smaller than their basic or expanded basic analog subscribers. However, in those locations where we have been successful in getting a cable channel for 11.2 and 11.3, we have had good response from viewers about the service they provide.

In conclusion, it is our hope that the FCC will reconsider its initial vote on the Multicast Must-Carry issue, and vote for it. We believe our local viewers are worth the commitment. What we need is the opportunity to reach them. Multicast must-carry will help make this possible.